

October 21, 2021

BY ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 5022 - Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency
National Grid's Comments Regarding Late Fees, Interest Charges, Credit Card Fees, Debit Card Fees and ACH Fees

Dear Ms. Massaro:

In response to the Rhode Island Public Utilities Commission's (PUC) Notice to Solicit Public Comments dated September 29, 2021, I write to share National Grid's¹ comments regarding whether the PUC should lift the prohibition on late fees, interest charges, credit card fees, debit card fees and ACH fees ("collectively, fees").²

The Company believes that the PUC should lift the prohibition on the fees. The re-establishment of late payment charges is a critical part of returning to business as usual in the post-COVID-19 Pandemic (Pandemic) environment. The Company's inability to collect the fees has resulted in the loss of approved tariff revenue, and the reinstatement of the fees would likely have a positive impact on customers' actions as it concerns paying their bills. As explained in the Company's response to PUC Data Request 6-1 in this docket, there has been a tremendous growth in arrears since the suspension of late fees at the end of March 2020. For example, the 180+ day arrears increased by approximately \$52 million at the end September 2021 as compared to March 2020 for the combined electric and gas businesses. Although the threat of termination creates the most powerful incentive for customers to pay their bills, the late payment charge serves to condition customers' behavior because customers typically seek to avoid any additional fees associated with their bills.

If the PUC were to lift the prohibition on fees, National Grid believes that 60 calendar days is reasonable notice period to educate customers.³ Notwithstanding the Company's position that the prohibition on charging fees should be lifted, the Company recognizes the hardships

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or "Company").

² Please also see the Company's September 2, 2021 responses to the PUC's sixth set of data requests in this docket.

³ In its response to PUC data request 6-2 in this docket, the Company noted that 30 calendar days was reasonable notice. However, the Company has since revisited this issue and believes that 60 days is appropriate notice to customers, which would also provide the Company with sufficient time to make any necessary system changes to reflect the reinstatement of fees.

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customers still face due to the significant long-term impacts of the Pandemic and remains focused on supporting customers who are having difficulty paying their bills through the many programs the Company offers to such customers.

The Company appreciates the opportunity to submit these comments. Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



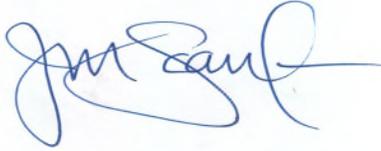
Raquel J. Webster

cc: Docket 5022 Service List
Jon Hagopian, Esq.
John Bell, Division
Linda George, Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

October 21, 2021

Date

**Docket No. 5022 – COVID-19 Emergency Order
Service List as of 10/12/2021**

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